

WEIL, GOTSHAL & MANGES LLP

Richard W. Slack (pro hac vice)
(richard.slack@weil.com)
Jessica Liou (pro hac vice)
(jessica.liou@weil.com)
Matthew Goren (pro hac vice)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbbkllp.com)
425 Market Street, 26th Floor
San Francisco, CA 94105
Tel: (415) 496-6723
Fax: (650) 636 9251

Attorneys for the Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

LATHAM & WATKINS LLP

Joshua G. Hamilton (#199610)
(joshua.hamilton@lw.com)
Michael J. Reiss (#275021)
(michael.reiss@lw.com)
10250 Constellation Blvd., Suite 1100
Los Angeles, California 90067
Tel: (424) 653-5500

LATHAM & WATKINS LLP

James E. Brandt (pro hac vice)
(james.brandt@lw.com)
1271 Avenue of the Americas
New York, NY 10020
Tel: (212) 906-1200

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Case Nos. 19-30088 (DM)

(Lead Case) (Jointly Administered)

**DECLARATION OF RICHARD W. SLACK
IN SUPPORT OF REORGANIZED
DEBTORS' BRIEF REGARDING
DISCOVERY STAY**

1 I, Richard W. Slack, hereby declare that the following is true and correct to the best of my
2 knowledge, information, and belief:

3 1. I am a member of Weil, Gotshal & Manges LLP, counsel for Pacific Gas and
4 Electric Company and PG&E Corporation (collectively, the “**Debtors**” or “**Reorganized**
5 **Debtors**”). I respectfully submit this declaration in support of *Reorganized Debtors’ Brief*
6 *Regarding Discovery Stay*.

7 2. Attached as **Exhibit A** is a true and correct copy of a June 26, 2023 email I sent to
8 Susan DiCicco copying counsel for the RKS Claimants, Baupost, and others, with the subject line
9 “RE: PG&E -- Proposed Order with Objectors’ comments.”

10 3. Attached as **Exhibit B** is a true and correct copy of a July 9, 2023 email and
11 attachments I sent to Susan DiCicco and others copying counsel for PERA, the RKS Claimants,
12 Baupost, and others, with the subject line “Draft Procedures re Securities Claims.”

13 4. Attached as **Exhibit C** is a true and correct copy of a July 19, 2023 email Michael
14 Palmieri, counsel for Baupost, sent to me and others, with the subject line “RE: PG&E -- Draft
15 Procedures re Securities Claims.”

16 5. Attached as **Exhibit D** is a true and correct copy of a December 15, 2023 email and
17 attachments Michael Palmieri, counsel for Baupost, sent to me and others, with the subject line
18 “In re PG&E Corp. . . . Requests for Production and Deposition Subpoenas.” Baupost served
19 requests for production to Reorganized Debtors and deposition subpoenas for four non-parties.

20
21 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
22 and correct to the best of my knowledge, information, and belief.

23
24 Executed January 16, 2024 in New York.

25 /s/ Richard W. Slack
26 Richard W. Slack
27
28